



**LINCOLN-LANCASTER COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL PUBLIC HEALTH DIVISION**

AIR QUALITY PROGRAM

3140 N STREET, LINCOLN, NE 68510

ph: 402.441.8040 web: www.lincoln.ne.gov/city/health/enviro/pollu/air.htm

Insignificant Activities List for Class I (Title V) Sources

GENERAL INSTRUCTIONS

After reading these instructions, complete Table 3-C: Insignificant Activities List, located in Section 3 of the LLCHD 'Air Quality Operating Permit Application – Class I (Title V) Specific Source'.

Insignificant activities are those activities and/or emission units that could possibly be excluded from inclusion in an operating permit application or, if included, listed in the application with a limited amount of support information.

Please note that, while exempt from reporting, all units listed in Parts 3 and 4 of these instructions must still be included in the determination of whether a source (facility) must obtain a Class I or Class II operating permit.

All emission units that are subject to a NSPS, NESHAP, and/or construction permit requirement are not insignificant activities. This includes all types of emissions units listed in this document. For those units subject to a NSPS, NESHAP, and/or construction permit requirement, you must assign an emission unit identification number, complete the appropriate emission unit application forms, and calculate and submit emissions as part of the Annual Emission Inventory Report to the LLCHD.

Stationary compression ignition internal combustion engines constructed, reconstructed, or modified after July 11, 2005, and stationary spark ignition internal combustion engines constructed, reconstructed, or modified after June 12, 2006, may be subject to NSPS requirements. The engine NSPS does not have minimum horsepower ratings, so engines of any size may be affected.

You must also consider NESHAP applicability to your engines. An affected source under 40 CFR 63 Subpart ZZZZ is any existing, new, or reconstructed stationary reciprocating internal combustion engine (RICE) located at a major or area source of hazardous air pollutant emissions, excluding stationary RICE being tested a stationary RICE test cell/stand [§63.6590(a)]. Existing RICE, while subject to Subpart ZZZZ, may not have any applicable requirements at the time you are reviewing these instructions. However, the U.S. Environmental Protection Agency has proposed revisions to Subpart ZZZZ that will add requirements for some existing RICE. If your RICE meets the definition of a new or reconstructed RICE, please review Subpart ZZZZ to determine applicable requirements for your specific RICE. Please note that any RICE subject to Subpart ZZZZ, whether or not it has applicable NESHAP requirements, cannot be an insignificant activity.

LIST OF EXEMPT ACTIVITIES FOR CLASS I SOURCES

- I. The following activities are exempt from inclusion in the Operating Permit Application and Annual Emissions Inventory Reports.
 - A. Office Activities, including operation of standard office equipment when such activities are conducted solely in support of the principal business activity, not including printers or businesses primarily involved in photographic reproduction
 - B. Janitorial activities, services, and consumer use of janitorial products
 - C. Maintenance of processing equipment, machinery and/or control devices, buildings, grounds or facilities to maintain appearance or condition provided these activities are not conducted as part of a manufacturing process and do not trigger a permit modification
 - D. Portable, sealed storage containers that are not connected to a process unit or line by piping, transfer hoses, lines or valves, etc.
 - E. Air conditioning units used for human comfort
 - F. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing, industrial, or commercial process.
 - G. Non-commercial food preparation
 - H. Laundry activities, except for dry-cleaning and steam boilers
 - I. Tobacco smoking rooms and areas
 - J. Forges and drop hammers or hydraulic presses used for forging or metal working
 - K. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal, or plastic
 - L. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals
 - M. Air compressors and pneumatically operated equipment, including hand tools
 - N. Batteries and battery charging stations, except at battery manufacturing plants



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- O. Equipment used to mix and package items such as soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
- P. Equipment used exclusively to slaughter animals
- Q. Vents from continuous emissions monitors and other analyzers
- R. Natural gas pressure relief vents/valves
- S. Hot melt adhesives with no VOC or HAP in the formulation
- T. CO₂ lasers, used only on metals and other materials which do not emit HAP in the process
- U. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam
- V. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants
- W. Laser trimmers using dust collection and that do not result in emissions of HAP metals
- X. Laboratory equipment used for physical or chemical analysis but not lab fume hoods or vents
- Y. Routine calibration and maintenance of laboratory equipment or other analytical instruments
- Z. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis
- AA. Hydraulic and hydrostatic testing equipment
- BB. Environmental chambers not using HAP gasses
- CC. Shock Chambers, Humidity Chambers, and Solar Simulators
- DD. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted
- EE. Process water filtration, deionization, and demineralization systems, demineralizer water tanks, and demineralizer vents
- FF. Boiler water treatment operations, not including cooling towers
- GG. Oxygen scavenging (de-aeration) of water
- HH. Ozone generators
- II. Fire suppression systems
- JJ. Emergency road flares
- KK. Steam vents and safety relief valves
- LL. Steam leaks
- MM. Steam cleaning and sterilizer operations
- NN. Employee support activities such as cafeteria and recreational facilities
- OO. Laboratory and Research and Development Activities conducted exclusively in the non-processing areas of the facility
- PP. Petroleum storage and distribution equipment at retail point-of-sale facilities

- II. The following activities must be included in Table 3-C: Insignificant Activities List unless Part I. of these instructions applies to the activity. The emissions associated with the following activities do not need to be included in the Annual Emissions Inventory Reports unless the emissions data is requested by LLCHD.
- A. Comfort cooling towers and process cooling towers with a circulating water flow rate less than 2,000 gallons per minute. In the "Additional Information" column of Table 3-C, include the circulating water flow rate, total dissolved solids concentration, estimated drift loss, and average hours or days in service.
 - B. Space heaters. In the "Additional Information" column of Table 3-C, include the heat input rating, fuel type, including a summary of annual fuel use for space heating, and number of heaters with the same rating and fuel type.
 - C. Fuel storage and distribution equipment, including storage vessels (tanks) with aggregate annual throughput of less than 1 million gallons for the entire facility. Records verifying aggregate annual fuel throughput must be maintained for 5 years and made available to NDEQ or U.S. EPA within 48 hours of a request for documentation of annual throughput.
 - D. Stationary external combustion units using the listed fuel type and rated below the corresponding heat input rating. In the "Additional Information" column of Table 3-C, include heat input rating of the unit, fuel(s) fired, and average hours or days of service.

Fuel Type	Heat Input Rating
Natural Gas	10.0 Million British Thermal Units per Hour (MMBtu/hr)
Diesel Oil	8.0 MMBtu/hr
No. 2 Fuel Oil	8.0 MMBtu/hr
No. 6 Fuel Oil	2.0 MMBtu/hr



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Coal	1.5 MMBtu/hr
Wood	5.5 MMBtu/hr
Propane	8.0 MMBtu/hr
Kerosene	8.0 MMBtu/hr

- E. Stationary internal combustion units using the fuel listed below and rated below the corresponding heat input rating. In the "Additional Information" column of Table 3-C, include size of the unit, fuel(s) fired, and average hours or days of service.

Fuel Type	Maximum Horsepower (HP)
Natural Gas (turbine)	1,630 HP
Natural Gas (4-Cycle)	415 HP
Diesel Oil	296 HP
Gasoline	26 HP
Propane	200 HP
Kerosene	200 HP

- III. Except when a source has permit limitations that make the source a synthetic minor under the Hazardous Air Pollutant (HAP) program, HAP emission units are included in the insignificant activities list but excluded from the Annual Emissions Inventory Reports if annual HAP emissions are below the reporting levels (pounds/year) in Appendix III to the Lincoln-Lancaster County Air Pollution Control Program Regulations and Standards. You may see the Appendices on LLCHD Air Quality Program webpage at the following address

<http://www.lincoln.ne.gov/city/health/enviro/pollu/airregs/index.htm>

LLCHD may request that these HAP emissions be reported. When completing Table 3-C, please place the annual HAP emissions in the "Additional Information" column.

- IV. Storage and handling of lubricating and heavy oils with a vapor pressure less than 0.5 psi under standard conditions, when held for facility use only, are exempt from inclusion in the Operating Permit Application and Annual Emissions Inventory Reports. However, LLCHD asks that you list the tanks/storage devices located at your facility so that LLCHD is aware that they exist at your facility. If you store or handle lubricating and heavy oils with a vapor pressure less than 0.5 psi, under standard conditions, please include these activities in the insignificant activities list. Please list the vapor pressure of the material in the "Additional Information" column.